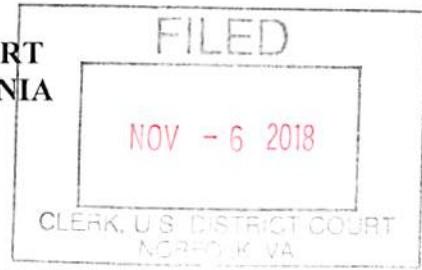


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division



**JOHN T. MIDGETT, TRUSTEE OF THE
HARDCastle CHARITABLE REMAINDER
ANNUITY TRUST U/A AUGUST 6, 2007,**

Plaintiff,

v.

CIVIL ACTION NO. 2:17-cv-663

MAILE SUSAN HARDCastle.

Defendant.

ORDER

After thorough review of the brief from both parties, the Court will hold any ruling on the Cross-Motions for Summary Judgment in abeyance because it cannot resolve these Motions until there is clarity regarding whether the Charitable Remainder Annuity Trust ("CRAT") does or does not owe any taxes and the amount that may or may not be owed.

Therefore, this action is **STAYED** until the Internal Revenue Service has completed its field examination to determine the amount of tax that Mrs. Mary V.M. Hardcastle's estate owes.

IT IS SO ORDERED.

Norfolk, Virginia
November 6, 2018



Raymond A. Jackson
United States District Judge